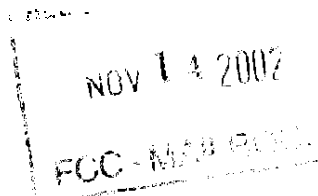




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November 8, 2002



Ms Marlene Dortch, Secretary  
The Federal Communications Commission  
445 12<sup>th</sup> Street, S W  
Washington, D C , 20554

IN RE RM-10586; DA 02-2732 Comments on Proposal to Revise MMDS and ITFS Service Rules.

Dear Ms Dortch

F Corporation is an MMDS Licensee utilizing the F Group in the Metropolitan Washington, D.C. (WHT 659). Our company is a wholly-owned subsidiary of The George Mason University Instructional Foundation and it is over our combined channels that GMU instructional programming, as well as C-SPAN and the open meetings of the Federal Communications Commission are transmitted to interested parties throughout the Metropolitan area. Together, the Foundation and its subsidiary are The Capitol Connection.

The Capitol Connection began **its** first operations in December of **1981**, and has been operating continuously since then. Ours is a strictly analog video operation and we serve more than 1,750 offices, government agencies, law firms, trade associations, schools and Universities in over 540 separate buildings throughout metropolitan Washington, Maryland, and Virginia. There are approximately 35,000 television sets connected to our service.

Despite the fact that we are heavy video users of this spectrum, we are writing in this Comment period to strongly support the Proposal, filed on October 7, 2002 by the WCA, the National ITFS Association and the Catholic Television Network. This proposal has clearly been carefully and thoughtfully crafted to provide all incumbents in this spectrum band with the best *of* both worlds.

If the Commission adopts these proposals, our video operations will be able to continue and even to expand through the deployment of digital modulation and compression. We will also gain access to more than 36 MHz **of our** own spectrum to provide high speed, broadband wireless voice and data links on George Mason's three campuses. These broadband services, deployed in a combination *of* fixed, portable, and mobile configurations (**all** of which are made possible by this proposal), open up incredible new opportunities for us to support the George Mason University's educational mission.

*[Handwritten signature]*  
LISA A. GIBSON

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A Telecommunications Service of  
The George Mason University Foundation

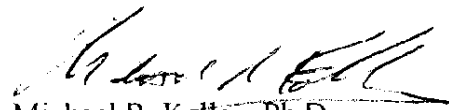
Marlene H. Donch, Pg. 2

If the Commission adopts the proponents' Proposal, we will also have the opportunity to take some or all of our newly cleared licensed spectrum and deploy it in partnership with a larger commercial entity. Such a commercial telecommunications entity may have the financial ability to build out a much wider area cellular network on our licensed spectrum which we could use along with that partner's other customers.

Seldom does a Public Policy proposal come along that is so clearly a "win-win" situation for everyone who is currently licensed in this band. Commercial MMDS licensees like us are winners in this scenario, keeping our video operations, and gaining access to unencumbered spectrum for our own use or for shared uses with commercial partners. Non-Commercial ITFS operators enjoy these exact same opportunities and benefits.

Those who crafted this proposal have done a wonderful job of balancing everyone's best interests. F Corporation sincerely hopes that the FCC will move quickly to adopt these proposals so that users of this spectrum can continue to provide their current valuable services and additional portable and mobile broadband services can quickly be made available to the American public.

Respectfully submitted,



Michael R. Kelley, Ph.D.  
Chief Executive Officer

cc: Charles M. Oliver  
Qualex International